UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Jean-Marc Zimmerman (JZ 7743)
Zimmerman, Levi & Korsinsky, LLP
226 St. Paul Street
Westfield, NJ 07090
Tel: (908) 654-8000
Fax: (908) 654-7207
jmzimmerman@zlk.com

Attorneys for Plaintiff Refined Recommendation Corporation

REFINED RECOMMENDATION CORPORATION, Plaintiff, v. NETFLIX, INC., Defendant.	**Case No.** **COMPLAINT FOR PATENT INFRINGEMENT** **DEMAND FOR JURY TRIAL**

Plaintiff, Refined Recommendation Corporation (hereinafter referred to as "Refined Recommendation"), demands a jury trial and complains against the defendant as follows:

THE PARTIES

1. Refined Recommendation is a corporation organized and existing under the laws of the State of Delaware, having a place of business at 500 Newport Center Drive, 7th Floor, Newport Beach, California 92660.

2. Upon information and belief, Netflix, Inc. (hereinafter referred to as "Defendant" or "Netflix") is a corporation organized and existing under the laws of the State of Delaware, having a place of business at 100 Winchester Circle, Los Gatos, California 95032.

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JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States of America, Title 35 of the United States Code. This Court has jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is doing business and committing infringements in this judicial district and are subject to personal jurisdiction in this judicial district.

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b).

CLAIM FOR PATENT INFRINGEMENT

6. Plaintiff, Refined Recommendation, repeats and incorporates herein the entirety of the allegations contained in paragraphs 1 through 5 above.

7. On August 12, 2003, U.S. Patent No. 6,606,102 (hereinafter referred to as "the '102 patent") was duly and legally issued to Gary Odom for an invention entitled "Optimizing Interest Potential". The '102 Patent was subsequently assigned to Refined Recommendation. A copy of the '102 patent is attached to this Complaint as Exhibit 1.

8. Refined Recommendation is the owner of all right, title and interest in and to the '102 patent.

COUNT ONE

9. Plaintiff, Refined Recommendation, repeats and incorporates herein the entirety of the allegations contained in paragraphs 1 through 8 above.

10. Netflix has and still is infringing, actively inducing the infringement of and contributorily infringing in this judicial district, the '102 patent by, among other things, making, using, offering to sell, selling and/or importing computer hardware, software and systems for accommodating user interests pursuant to a claim of the '102 patent without permission from Refined Recommendation and will continue to do so unless enjoined by this Court.

11. Plaintiff has been damaged by such infringing activities by the Defendant of the '102 patent and will be irreparably harmed unless such infringing activities are enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff Refined Recommendation prays for judgment against the Defendant Netflix on all the counts and for the following relief:

A. Declaration that the Plaintiff is the owner of the '102 patent, and that the Plaintiff has the right to sue and to recover for infringement thereof;

B. Declaration that the '102 patent is valid and enforceable;

C. Declaration that the Defendant has infringed, actively induced infringement of, and contributorily infringed the '102 patent;

D. A preliminary and permanent injunction against the Defendant, each of its officers, agents, servants, employees, and attorneys, all parent and subsidiary corporations, their assigns and successors in interest, and those persons acting in active concert or participation with them, including distributors and customers, enjoining them from continuing acts of infringement, active inducement of infringement, and contributory infringement of Refined Recommendation's '102 patent;

Q. An accounting for damages under 35 U.S.C. §284 for infringement of Refined Recommendation's '102 patent by the Defendant and the award of damages so ascertained to the Plaintiff, Refined Recommendation, together with interest as provided by law;

R. Award of Refined Recommendation's costs and expenses; and

S. Such other and further relief as this Court may deem proper, just and equitable.

DEMAND FOR JURY TRIAL

The Plaintiff, Refined Recommendation, demands a trial by jury of all issues properly triable by jury in this action.

By: /s/Jean-Marc Zimmerman

Jean-Marc Zimmerman (JZ 7743)
Zimmerman, Levi & Korsinsky, LLP
226 St. Paul Street
Westfield, NJ 07090
Tel: (908) 654-8000
Fax: (908) 654-7207
jmzimmerman@zlk.com
Attorneys for Plaintiff Refined Recommendation Corporation

Dated: October 12, 2007
Westfield, NJ